

# United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

United States Courts  
Southern District of Texas

**CRIMINAL COMPLAINT**

Daniel Alexis Lopez-Guerrero

Principal

FILED

Case Number:

YOB: 1999

USC

October 12, 2021

**M-21-2162 -M**

Nathan Ochsner, Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 11, 2021 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Guillermo Martinez-Lopez and Dario Guzman-Navarrete, citizens and nationals of Mexico, and four (4) other undocumented aliens, for a total of six (6) who had entered the United States in violation of law, did knowingly transport, or move or attempted to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Donna, Texas to a point near Donna, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) **FELONY**  
I further state that I am a(n) U.S. Border Patrol Agent and that this complaint is based on the following facts:

On October 11, 2021, a Border Patrol Agent was conducting routine patrol duties in Donna, Texas near the Rio Grande River. The area is farmland vegetation and consistently utilized by work truck type vehicles. At approximately 10 a.m., the Agent observed a black Volkswagen sedan, which did not fit the typical vehicles observed in the area, driving near the river. Since the vehicle seemed out of place, the Agent informed a camera operator to monitor its direction of travel and activity.

**SEE ATTACHED**

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

**Complaint authorized by AUSA P. Warner**

/s/ William A. Dubois

Signature of Complainant

Submitted by reliable electronic means, sworn to and attested telephonically per Fed. R. Cr.P.4.1, and probable cause found on:

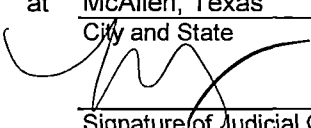
William A. Dubois Border Patrol Agent

Printed Name of Complainant

October 12, 2021 **5:23 PM**  
Date

at McAllen, Texas  
City and State

Nadia S. Medrano, U. S. Magistrate Judge  
Name and Title of Judicial Officer

  
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-21-2162-M**

**RE: Daniel Alexis Lopez-Guerrero**

**CONTINUATION:**

As seen on camera the sedan stopped near the river and several suspected undocumented aliens emerged from the brush and entered into the sedan. Shortly thereafter, the subjects then exited the vehicle and ran back into the nearby brush. The sedan then left the immediate area and after a brief time, returned to the same location. The same subjects once again emerged from the brush and boarded the Volkswagen sedan. The sedan drove a short distance and abruptly came to a stop as the subjects exited and ran into the brush once more. The sedan then drove north, and a vehicle stop was conducted by responding Agents. Simultaneously, Agents responded to the last known location of the subjects, who exited the sedan, and were able to locate six (6) subjects who freely admitted to being illegally present in the United States. The driver of the Volkswagen sedan was interviewed and identified as Daniel Alexis Lopez-Guerrero and determined to be a United States citizen. All of the subjects were subsequently transported to the Weslaco, Texas Border Patrol Station for processing.

**PRINCIPAL STATEMENT:**

Daniel Alexis Lopez-Guerrero was read his Miranda Rights. He understood and agreed to provide a sworn statement.

Lopez, a United States Citizen, stated he was offered a job picking up illegal aliens in an area known as McManus Ranch in Donna, Texas. Lopez was to be paid \$300 per person. Lopez said he was provided with a phone and received the location of where to pick up the illegal aliens. Lopez stated he picked up six (6) people on a dirt road. Lopez said he picked up and dropped off the people two (2) times because there were Border Patrol units in the area. Lopez stated he left without the aliens because the area was too hot, indicating there was Border Patrol Agents in the area. Lopez was then stopped by Border Patrol Agents.

**MATERIAL WITNESS 1 STATEMENT:**

Guillermo Martinez-Lopez, a citizen and national of Mexico, was advised of his Miranda Rights. He understood and was willing to provide a sworn statement.

Martinez-Lopez stated he was to pay 70,000 pesos for his smuggling fees. He stated he crossed the river with six people including him. He stated he got into a dark in color four door car and shortly after, the driver instructed him to get out of the vehicle, he did so, and hid in the brush. He stated he again got in the car for a second time and the driver drove off and then again asked the group to get out the vehicle. He stated he hid in the brush and then Border Patrol arrived.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

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**CONTINUATION:**

**MATERIAL WITNESS 2 STATEMENT:**

Dario Guzman-Navarrete, a citizen and national of Mexico, was advised of his Miranda Rights. He understood and was willing to provide a sworn statement.

He stated he crossed into the United States with a group of six (6). He stated after crossing the guide told him to get into a dark in color car. When he got in he laid down on the floor of the car. He stated the driver then instructed them to get out of the vehicle. He got of the vehicle and waited a few minutes until the car returned and he got back in. He stated the vehicle drove for a short time and the driver then instructed them to exit the vehicle. He then hid in the grass and Border Patrol arrived and apprehended him.

Guzman-Navarrete was shown a photo lineup and was able to identify Daniel Alexis Lopez-Guerrero as the driver of the vehicle.